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Claims 1-15 were rejected under 35 USC 102 as being anticipated by Sattar, U.S. Patent 5,572,581. Applicants respectfully traverse.

In connection with first clause of claim 1, the Examiner asserts that IP 42 receives an alert message from SCP 24, and that the message specifies a communication protocol parameter. In support of this assertion the Examiner points to FIG. 2 and relative to the alert message the Examiner refers to "e.g., instruction/data package". Relative to the message specifying a communication protocol parameter the Examiner adds

> for example, the instructions/data package sent to IP 42 via SCP 24, indicates what services are required or needed for the calling party, which may include fax retrieval, voice recognition, text-to-voice functions, digit collection, etc. see col. 7, lines 18-33.

FIG. 2 depicts a block diagram of apparatus, and it does not show any method steps. Aside from supporting the Examiner's comment as quoted above, the passage at col. 7, lines 18-33 teaches that IP 42 depends on SCP 24 for its instructions, that SCP 24 sends a "data package" to IP 42, that in response IP 42 executes "a simple call processing resource" and sends back a data package to SCP 24 indicating completion of the resource.

In contradistinction, the first clause of claim 1 specifies a step of

> an intelligent peripheral receiving an alert message, from a database unit, which message specifies a communication protocol parameter

and in the phrase "specifies a communication protocol parameter" what is specified is a parameter, but the modifier for this parameter is "communication protocol." In other words, it is a parameter that pertains to communication protocol, which means that the parameter specifies the communication protocol. A communication protocol is the set of rules that must be followed in order for communication to take place. The communication protocol is totally blind to the substance of the information that is communicated. Specifying what services are required is the substance of the communication, and it is NOT a specification of a communication protocol, or a communication protocol parameter.

Respectfully, there is nothing in the cited FIG. 2, in the cited text, or even in the Examiner's comments that describes or suggests the notion of a message being sent to IP 42 which specifies a communication protocol (or a communication protocol parameter). This overcomes the rejection.

Brush 113579con

In connection with subsequent clauses of claim 1, the Examiner again makes reference to hardware elements in FIG. 2, and to text at col. 7, lines 44-66, which states

> To initiate important person prompting, calling party 16 places a call to called party 18. When switch 10 receives another call destined for calling party 16, switch 10 accesses the customer profile of calling party 16 from switch database 12 and realizes that calling party 16 subscribes to important person prompting. Switch 10 then sends a data package to SCP 24 through STP 26. Alternatively, switch 10 may issue a data package to SCP 24 requesting aid, and SCP 24 can determine that calling party 16 subscribes to important person prompting. SCP 24, which is running SLEE 32, then processes the call by sending IP 42 a data package containing a request to play the name of the listed important person attempting to call. This data package can be sent from SCP 24 to IP 42 using any of the possible communications links described above. IP 42, in this example, includes a voice synthesis resource that generates the spoken name. Thus, the data package sent to IP 42 may contain the letters of the "important person's" name. SCP 24 also sends a data package to switch 10 to open a voice channel on link 44 between IP 42 and switch 10 for the announcement.
>
> Thus, IP 42 responds to a resource request from SCP 24, in this case a text-to-voice operation, and acts as a slave of SCP 24 in delivering the requested resource.

Clearly, the above-quoted passage describes a portion of a process when the services if IP 42 are needed, but it says absolutely nothing about the establishment of a connection between SCP 24 and IP 42 to operate in accord with the protocol that is specified in an alert message. In contradistinction, the second clause of claim 1 specifies a step of

> with reference to a database within said intelligent peripheral, establishing a connection between said database unit and said intelligent peripheral to operate in accord with a protocol pointed to by said protocol parameter (emphasis supplied)

Since this clause is clearly not disclosed by the reference, the rejection is, once more, traversed.

Claim 2 contains five clauses, and the second through fourth clause pertain to the limitations discussed above in connection with claim 1. For the reasons expressed in connection with claim 1, it is respectfully submitted that claim 2 is not anticipated by the reference. Additionally, claim 2 contains limitations that are not explicitly stated in claim 1 and those limitations, as well, make claim 2 not anticipated by the reference. For example, claim 2 specifies a step of the IP perusing an internal database to determine

parameters for establishing a connection in accord with the specified protocol. There is no mention of such a step in the reference and, in fact, there is no mention of any database within IP 42.

Claims 3-15 depend on claim 2 and, therefore, claims 3-15 are also not anticipated by the reference.

In light of the above remarks, it is respectfully submitted that the rejection of claims 1-15 has been overcome. Reconsideration and allowance are respectfully solicited.

Respectfully,
Wesley A. Brush
James M. Carnazza
Romel Khan

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By _____
Henry T. Brendzel
Reg. No. 26,844
Phone (973) 467-2025
Fax (973) 467-6589
email brendzel@comcast.net